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Operating Company, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TPOV ENTERPRISES 16, LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

PARIS LAS VEGAS OPERATING  
COMPANY, LLC, a Nevada limited liability  
company,

Defendant.

PARIS LAS VEGAS OPERATING  
COMPANY, LLC, a Nevada limited liability  
company,

Counterclaimant.

vs.

TPOV ENTERPRISES, LLC, a Delaware  
Limited Liability Company, TPOV  
ENTERPRISES 16, LLC, a Delaware Limited  
Liability Company, Rowen Siebel, an  
individual.

Counter-defendants.

CASE NO. 2:17-cv-00346-JCM-VCF

**STIPULATION AND PROPOSED ORDER  
EXTENDING DEADLINE TO RESPOND  
TO PLAINTIFF/COUNTERDEFENDANT  
TPOV ENTERPRISES 16, LLC'S MOTION  
TO COMPEL UPDATED FINANCIAL  
DATA AND TO FILE REPLY IN  
SUPPORT THEREOF**

**(SECOND REQUEST)**

Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC ("TPOV 16");  
Counterdefendant TPOV Enterprises, LLC ("TPOV"); Counterdefendant Rowen Seibel ("Seibel")  
(collectively, "Seibel and the TPOV Entities"); and Defendant/Counterclaimant Paris Las Vegas

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Operating Company, LLC ("Paris") (collectively, the "Parties"), by and through their undersigned counsel of record, stipulate and agree as follows:

1. On July 16, 2021, TPOV 16 filed a Motion to Compel Updated Financial Data (the "Motion to Compel"). (ECF No. 313.)

2. On July 30, 2021, the Parties filed a Stipulation and Proposed Order Extending Deadline to Respond to Plaintiff/Counterdefendant TPOV Enterprises 16, LLC's Motion to Compel Updated Financial Data (First Request). (ECF No. 319.)

3. On August 2, 2021, the Court granted the Parties' Stipulation and Proposed Order Extending Deadline to Respond to Plaintiff/Counterdefendant TPOV Enterprises 16, LLC's Motion To Compel Updated Financial Data (First Request). (ECF No. 320.)

4. Currently, the deadline to file a response to the Motion to Compel is August 6, 2021.

5. The Parties have agreed and respectfully request that the deadline to file a response to the Motion to Compel be extended by seven (7) days to August 13, 2021, to allow Paris additional time to finalize the response to the Motion to Compel.

6. Additionally, the Parties have agreed that Seibel and the TPOV Entities shall have an additional seven (7) days, until August 27, 2021, to file a reply in support of the Motion to Compel.

7. Additionally, on June 11, 2021, Paris filed its Motion to Stay Pending Production of Documents Pursuant to Crime-Fraud Exception (the "Motion to Stay"). (ECF No. 305.) In the event that the Motion to Stay is granted, in whole or in part, before this Court rules on the Motion to Compel, the Parties have agreed, without waiving any rights or arguments, that the pending Motion to Compel should be permitted to proceed.

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8. This is the second request to extend time, is made in good faith, with good cause, and will not impact any other deadlines.

DATED this 6th day of August 2021.

DATED this 6th day of August 2021.

PISANELLI BICE PLLC

BAILEY KENNEDY

By: /s/ M. Magali Mercera  
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*Attorneys for Paris Las Vegas Operating  
Company, LLC*

*Attorneys for TPOV Enterprises 16, LLC,  
TPOV Enterprises, LLC and Rowen Seibel*

**ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: August 13, 2021

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